## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OKLAHOMA

IN RE:		
GREEN COPPER HOLDINGS, LLC	)	CASE NO. 25-10088-T
EIN # xx-xxx9708	)	Chapter 7
COPPER TREE, INC.	)	<b>Substantively Consolidated</b>
EIN # xx-xxx6608	)	
THE INN AT PRICE TOWER INC.	)	
Debtors.	)	
	/	

## NOTICE OF VOLUNTARILY WITHDRAWAL OF CLAIM REGARDING MICHAEL J. MORAN and ERINEE MORAN JTRWOS (CLAIM NO. 15)

COME NOW, the Claimant MICHAEL J. MORAN and ERINEE MORAN JTRWOS (CLAIM NO. 15), by and through their undersigned counsel and hereby files this Notice of Voluntary Withdrawal as to Claim No. 15, and as grounds therefore states as follows:

- 1. On June 27, 2025 Trustee moved to Dismiss Claimants Claim. (See, Trustee's Motion to Dismiss as ECF 145).
- 2. Claimants claim is based upon their position as a shareholder in the debtor company Copper Tree Inc.
- 3. This claim and withdrawal differs entirely from, and does not involve, Michael J. Moran's claim No. 14, filed by and on behalf of his company Pictoria Studios USA, Inc., for money earned and owed by Debtor.
- 4. Claimant No. 15, MICHAEL J. MORAN and ERINEE MORAN JTRWOS no longer desire to be a claimant in this matter.

5. By the voluntary dismissal of this claim, no prejudice would be all any of the claimants

herein and in fact, cause less litigation to occur.

**NOTICE OF MEET AND CONFERAL:** 

On July 30, 2025, the undersigned conferred with Counsel for the Trustee, Mr. Mark

Sanders, who has no objection to this Notice.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your

rights and the effect of this document. If you do not want the Court to grant the requested relief, or you

wish to have your views considered, you must file a written response objection to the requested relief with

the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder,

Tulsa, Oklahoma 74103 no later than 14 days from the date of filing of this request for relief. You should

also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney

[and others who are required to be served] and file a certificate of service with the Court. If no response or

objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The \*

day period includes the three (3) days allowed for mailing provided for in Fed. R. Bankr. P. 9006(f). \*The

moving party shall calculate the appropriate response time. If a response time is prescribed by applicable

statute, rule, or order, the moving party shall add to the prescribed response time unless service is

accomplished by hand delivery, the three (3) days required for mailing under Bankruptcy Rule 9006(f). If

a response time is not prescribed by applicable statute, rule, or order, the response time shall be fourteen

(14) days, which includes the three (3) days required for mailing under Bankruptcy Rule 9006(f).

Dated: July 30, 2025

Respectfully Submitted by:

/s/ Craig Alan Brand, Esq.

Craig Alan Brand, Esq. Florida Bar No. (FBN): 896111 The Brand Law Firm, P.A. 6462 S. Jamaica Circle Englewood, Colorado 80111 Tel. (305) 878-1477

Craig@thebrandlawfirm.com

Attorney for: MICHAEL J. MORAN and ERINEE MORAN JTRWOS – Claim 15

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 30, 2025, a true and correct copy of the foregoing Notice of Withdrawal of Claim 15 was served electronically on participants in the CM/ECF system according to local procedures.

/s/ Craig Alan Brand, Esq.

Craig Alan Brand, Esq.
Florida Bar No. (FBN): 896111